

### REMARKS

The Examiner rejected claims 1-6 under 35 U.S.C. § 103(a) as being unpatentable over Yang (U.S. Patent No. 6,573,940) in view of De Haan et al. (U.S. Patent No. 6,122,016) (“De Haan”).

Claims 1-6 are pending in the application.

#### Rejection of Claims 1-6 under 35 U.S.C. § 103(a)

The Examiner rejected claims 1-6 as being unpatentable over Yang in view of De Haan. Applicant respectfully traverses.

Regarding claims 1, 3, and 5, Applicant maintains that neither Yang nor De Haan nor their combination teaches or suggests “adaptively filtering . . . using a human vision model.”

In the Office Action dated May 16, 2008 the Examiner alleged that this limitation is met by Yang’s filter 112. Applicant maintains that Yang’s filter 112 does not describe this limitation for the reasons set forth in the response dated July 28, 2008. In the outstanding Office Action dated November 14, 2008 the Examiner changes position and now alleges that De Haan teaches this limitation:

“De Haan et al discloses in col. 9, lines 23-34 that ‘The present implementation of the invention can also be used in a method of reducing interference artifacts in television pictures, which often introduce a single dominant sine-wave in a single direction which corresponds to a single peak in the two-dimensional frequency domain. By means of a partial block transform, it is possible to obtain the frequency coefficient(s) representing this interference, and to correct the signal with the difference between the inverse transform of the temporally filtered version of this or these coefficients and that of the original one . . .’ From the above passage, obtaining the frequency coefficient(s) representing the interference is **model** and this model is for human vision because this model is used for reducing interference artifacts in television pictures. Thus, the adaptive filtering of De Haan et al is a human vision model . . .” (pages 2-3, emphasis in original)

Applicant respectfully disagrees with the Examiner’s allegation. Again, one of ordinary skill in the art of video signal processing knows that a “human vision model” is a machine vision model which is designed to match the perceptual response of the human vision system. For example, see U.S. Patent No. 5,477,345 to Tse which designs colored optical filters of a sensor array “such that its spectral response matches the tristimulus response of the human eye as closely as possible.” (column 10, lines 47-51) For another example, see the JPEG compression

standard which quantizes high frequency detail more heavily in order to minimize data size without a perceptible loss of quality because human eyes are less sensitive to high frequency detail. (See <http://en.wikipedia.org/wiki/JPEG>)

In contradistinction, De Haan's method of reducing interference is not designed to match the perceptual response of the human vision system in any way. De Haan's partial block transform and temporal filter operate without any consideration whatsoever of how the human eye perceives the interference. Indeed, De Haan does not mention the human perceptual response once in his entire disclosure.

Applicant notes that the Examiner's assertion "obtaining the frequency coefficient(s) representing the interference is [a] model" misses the point. At best, De Haan models the frequency interference—not the human vision system.

For at least this reason, claims 1, 3, and 5, as well as claims 2, 4, and 6 which depend from them respectively, are not rendered obvious by Yang in view of De Haan. Accordingly, Applicant requests that the rejection of claims 1-6 under 35 U.S.C. § 103(a) be withdrawn.

#### Conclusion

In view of the foregoing remarks, allowance of claims 1-6 is urged, and such action and the issuance of this case are requested.

Respectfully submitted,

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